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ATTORNEYS FOR NUCOR STEEL-UTAH, A DIVISION OF NUCOR CORPORATION

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

COST OF SERVICE AND RATE DESIGN ISSUES FOR DOMINION ENERGY UTAH

Docket No. 20-057-11

PETITION TO INTERVENE OF NUCOR STEEL-UTAH, A DIVISION OF NUCOR CORPORATION

Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code § R746-1-108, Nucor Steel-Utah, a Division of Nucor Corporation ("Nucor") hereby petitions for leave to intervene in the above-referenced proceeding before the Public Service Commission of Utah ("Commission"). In support of this Motion, Nucor states as follows:

- 1. On February 25, 2020, the Commission issued a Report and Order in Docket No. 19-057-02. In the Order, the Commission established an investigatory proceeding to evaluate the TS class composition of Questar Gas Company d/b/a Dominion Energy Utah ("Dominion") and other cost allocation issues associated with rate classes.
- 2. On May 28, 2020, the Commission issued a Preliminary Scheduling Order in the above captioned docket, approving and adopting the initial process that Interested Parties outlined at a scheduling conference.
- 3. Nucor owns and operates a steel mill in Plymouth, Utah, and takes natural gas transportation service from Dominion. Nucor's full name and primary place of business is:

Nucor Steel-Utah A Division of Nucor Corporation P.O. Box 100 Plymouth, Utah 84330

4. As a major transportation customer of Dominion, Nucor has a direct interest in these proceedings and the outcome may have a substantial effect on Nucor's legal rights and interests. Nucor has not yet determined what, if any, positions it will take on any issues raised,

nor the relief it may seek to protect its interests.

5. Nucor's interest in the outcome of these proceedings will not be adequately

represented by any other party, nor will the interests of justice nor the orderly and prompt conduct

of these proceedings be materially impaired if Nucor is allowed to intervene.

6. The following persons should be included on the service list in these proceedings,

and all communications concerning this matter should be addressed to:

Damon E. Xenopoulos STONE MATTHEIS XENOPOULOS & BREW, PC 1025 Thomas Jefferson Street, N.W., 800 West Washington, DC 20007

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7. This filing is timely.

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WHEREFORE, for the reasons set forth above, Nucor requests that the Public Service Commission of Utah grant this timely Motion to Intervene and permit Nucor to participate in this proceeding with full rights as a party.

DATED this 10th day of June 2020.

Respectfully submitted,

/s/ Jeremy R. Cook

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Attorneys for Nucor Steel-Utah

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served $\underline{\text{via}}$ email this 10^{th} day of June 2020 to the following:

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